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MARINE INSURANCE CO. and
GREENAN, PEFFER, SALLANDER &
LALLY LLP

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

MANI SUBRAMANIAN, as an individual and)
citizen of Washington, and as a derivative)
action plaintiff,)

Plaintiff,)

vs.)

ST. PAUL FIRE & MARINE INSURANCE)
COMPANY, a Minnesota Corporation, and)
QAD, INC., a Delaware Corporation and)
principal place of business in California, and)
ARTHUR ANDERSON LLP, a limited)
liability partnership headquartered in Chicago,)
Illinois, and ANDERSEN WORLDWIDE SC,)
a Societe Cooperative headquartered in)
Geneva, Switzerland, and JOHN DOORDAN,)
an individual and citizen of California, and)
LAIFOON LEE, an individual and Citizen of)
California, and ROLAND DESILETS, an)
individual and citizen of new jersey, and)
WILLIAM D. CONNELL, an individual and)
citizen of California, and GREENAN)
PEFFER, SALLANDER AND LALLY LLP, a)
limited liability partnership headquartered in)
California, and RANDALL WULFF, an)
Individual, and DOES 1-50, inclusive,)

Defendants.)

Case No. C08-1426 JSW

**REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF ST. PAUL'S MOTION TO
DISMISS THE COMPLAINT OF MANI
SUBRAMANIAN FOR:**

- 1. SET ASIDE JUDGMENT AND ORDER (FRCivP rule 60(d)(1);**
- 2. CIVIL RICO (18 U.S.C. §1964 et seq.);**
- 3. FRAUD AND CONSPIRACY TO FRAUD;**
- 4. UNFAIR COMPETITION;**
- 5. VIOLATION OF CONSTITUTIONAL RIGHTS (42 U.S.C. §1983).**

Date: October 9, 2008

Time: 2:30 p.m.

Dept.: Courtroom 6

The Honorable Vaughn R. Walker

Greenan,
Peffer,
Sallander &
Lally LLP

Pursuant to Federal Rule of Evidence 201(b)(2) Defendants St. Paul Fire and Marine Insurance Company and Greenan Pepper Sallander & Lally, LLP request that the Court take judicial notice of the following documents and materials:

1. Complaint, *Vedatech, Inc. et al. v. St. Paul Fire & Marine Insurance Co, et al.*, filed in Action No. 04-1249 VRW, filed in this court;

2. Order of Chief J. Walker, dated June 22, 2005, Regarding Removal, Requests for Sanctions, and Motions to Dismiss in Related Actions Nos. 04-1249 VRW, 04-1818 VRW and 04-1403 VRW (2005 WL 1513130 (N.D. California);

3. Mandate of Ninth Circuit in No. 05-16405 (D.C. No. CV-04-1249 VRW), filed July 19, 2007;

4. Judgment, entered December 27, 2007, filed in Related Actions Nos. 04-1249 VRW, 04-1818 VRW and 04-1403 VRW;

5. Motion for relief from the Judgment (Rule 60(b) in Case No. 04-1249 VRW, filed June 5, 2008;

6. Motion for Correction and Clarification of the December 2007 Judgment in Case No. 04-1249 VRW, filed June 5, 2008;

7. Order of Chief J. Walker, dated July 17, 2008, Regarding Requests for Debtor's Examination and Order to Show Cause, Withdrawal of Counsel, and Motion for Relief from Judgment and Motion for Administrative Relief in Actions Nos. 04-1249 VRW, 04-1818 VRW and 04-1403 VRW; and

8. Notice of Motion, Motion and Memorandum for Clarification and reconsideration of July 17, 2008 Order, dated July 28, 2008 in Case Nos. 04-1249 VRW, 04-1818 VRW and 04-1403 VRW.

Dated: August 4, 2008

GREENAN, PEPPER, SALLANDER & LALLY LLP

By: /s/
JAMES S. GREENAN

Attorneys for Defendants ST. PAUL FIRE &
MARINE INSURANCE CO. and GREENAN
PEPPER SALLANDER & LALLY, LLP

Greenan,
Peffer,
Sallander &
Lally LLP

1 Regarding: REQUEST FOR JUDICIAL NOTICE IN SUPPORT OF MOTION TO DECLARE
2 PLAINTIFF MANI SUBRAMANIAN A VEXATIOUS LITIGANT AND FOR A PRE-FILING
3 ORDER PURSUANT TO 28 USC SECTION 1651

4 This filing is in paper or physical form only, and is being maintained in the case file in the
5 Clerk's office. If you are a participant in this case, this filing will be served in hard-copy shortly.
6 For information on retrieving this filing directly from the court, please see the court's main web
7 site at <http://www.cand.uscourts.gov> under Frequently Asked Questions (FAQ).

8 This filing was not efiled for the following reason(s):

9 Voluminous Document (PDF file size larger than the efilng system allows)

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